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Jack McGraw, EPA Acting Regional Administrator Robert Nelson, DOE Rocky Flats Plant Manager James Zane, EG&G Rocky Flats Plant Manager

Director, Office of the Environment, CDH

FROM: Rocky Flats Environmental Restoration Quality Action Team (QAT)

Gentlemen,

Thomas Looby,

MEMORANDUM

TO:

As an outgrowth of the dispute resolution process for OU 2 and a subsequent meeting including EPA Assistant Administrator Tad McCall and Acting DOE Rocky Flats Plant Manager Terry Vaeth, a Total Quality Management QAT was formed in early September, 1992, incorporating management level personnel from EPA, DOE, CDH, and EG&G. This group was formed to find ways to streamline implementation of plant environmental activities including the environmental restoration program to which DOE is committed under the Inter-Agency Agreement (IAG).

To this end, the group has identified eight general categories which are impacting environmental activities at Rocky Flats including resources, priorities/goals, communications, regulation/policy, contracting, technical issues, organization/management, and process issues. Inspired by an Operable Unit 8 dispute resolution in which DOE made a commitment to clarify and streamline the procurement process, the QAT chose the "contracting" category, or which procurement is a part, on which to focus initially.

During our October 8, 1992 meeting, the QAT invited expert representatives from EG&G, DOE, and EPA to present each organization's policies and procedures for contracting and procurement including Master Task Subcontracts (MTSs). Based of these very informative presentations, the group was able to conclude that properly constructed MTSs have many advantages for ER work; they mitigate the organizational conflict-of-interest (OCI) problem, obviate the need for repetitive contracting, and appear to streamline the "old" process. However based on the October 8th and subsequent sessions, it was apparent that broade training and communication within DOE and EG&G is needed so that MTSs can be use to their fullest potential.

To maximize the speed and efficiency with which the ER groups within both DOE an EG&G can make use of MTSs, the QAT is making the following recommendations:

- 1) Comprehensive training should occur immediately:
 - technical people should be trained on MTSs and
- contracting people trained on the unique needs of the ER staff. 2) Technical people and contracting people should be co-located in the same office facility.
- 3) A short-term working group should be formed including both technical ar contracting staff to discuss and decide
 - what is needed by each group from the other and
 - what a "model" statement-of-work (SOW), procurement requisition (PR), and independent cost estimate (CE) should look like a include for an environmental restoration MTS.
- 4) A consistent approach should be developed by the procurement group f dealing with ER issues.
- 5) The value added of each signature now needed for approval of the SO PR, and CE should be reviewed to facilitate additional streamlinin particularly if "model" SOW, PR, and CEs are developed.

6) "Supertask" MTSs should be used to implement the IAG cleanup proce

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from at least the Remedial Investigation (RI) to the Record of Decision

7) MTSs should be written or amended to allow for extension beyond the

current 3-year term.

8) Technical Managers of any project should be able to choose the best qualified firm from among the pool of contractors according to selection guidelines specified by the procurement department.

9) Even though the current ER services MTSs provide for design work, the ARE contract should also be awarded to provide additional flexibility.

- 10) Consideration should be given to whether MTSs should be awarded on a staggered basis to ensure future availability and continuity.
- 11) Consideration should be given to whether future MTSs should include remedial design and remedial construction activities in the scope.

The QAT will also be tracking and monitoring the Design Criteria Procedures MTS as a pilot to see how the new process is working. In addition, the QAT will revisit this entire procurement issue again in three months to review progress that has been made. Our review will include the following:

- number of MTS-type contracts let,

- number of tasks ordered,

- procurement processing time,
- any problems encountered,SOW, PR, and CE preparation time,
- status of training plan, and
- status of "model" SOW, PR, and CE (including those for IM/IRAs).

. Sincerely,

The	Rocky	Flats	Environmental Restoration QAT				
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	Frazer Lockhart, Director ER Division, DOE						
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	Tom	Green	gard, Acting Director, Environmental Scien and Engineering, EG&G	ce			
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